

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : :

v. : CRIMINAL NO. 14-379

ROBERT WENDELL LANDIS : :

O R D E R

AND NOW, this _____ day of _____ 2015, it is ORDERED that the pre-trial release order issued by United States Magistrate Judge Henry S. Perkin of the United States District Court for the Eastern District of Pennsylvania is hereby STAYED pending a decision on the government's appeal of this order. It is further ORDERED that defendant ROBERT WENDELL LANDIS shall be **DETAINED** until the District Court can hear the appeal of the government with respect to its motion for detention. It is further ORDERED that a hearing is scheduled on this matter for the _____ day of _____, 2015 at _____.

BY THE COURT:

HONORABLE STEWART DALZELL
Judge, United States District Court

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

v. : MAGISTRATE NO. 14-379

ROBERT WENDELL LANDIS :

**GOVERNMENT'S MOTION FOR A STAY AND REVOCATION OF
RELEASE ORDER, AND APPEAL PURSUANT TO 18 U.S.C. § 3145(a)**

The United States of America, by Zane David Memeger, United States Attorney for the Eastern District of Pennsylvania, Michael L. Levy, Section Chief, and Roberta Benjamin, Assistant United States Attorney, respectfully moves this Court for an Order, pursuant to 18 U.S.C. § 3145(a)(1), staying and revoking the pre-trial release order issued by Magistrate Judge Henry S. Perkin, U.S.M.J., on March 17, 2015, releasing defendant ROBERT WENDELL LANDIS on \$100,000 O/R bail without having same secured by a property, placing him on electronic monitoring and other usual conditions of pre-trial release, and for an Order scheduling a prompt hearing for consideration of the government's instant motion requesting the defendant's pre-trial detention.

I. INTRODUCTION

Based upon a second superseding indictment, the defendant ROBERT WENDELL LANDIS was charged with violating one count of possession of child pornography, in violation of 18 U.S.C. § 2252(a)(4)(B), two counts of receipt of child pornography, in violation of 18 U.S.C. § 2252(a)(2), one count of online enticement, in violation of 18 U.S.C. § 2422(b), and one count of production of child pornography, in violation of 18 U.S.C. § 2251(a). The charges are based on a

27 year old defendant's enticement of a 15 year old minor girl (minor). The defendant communicated extensively through Facebook chats, with the minor, having told her he was 18 years old. He convinced her to take sexually explicit images of herself and to send those images to him. The minor girl did this. Eventually, the defendant met with the minor and engaged in sexual relations with her on multiple occasions. These activities included vaginal and anal intercourse and fellatio. This illegal activity, including the minor's sending sexually explicit pictures of herself to the defendant's emails, took place over a number of months, in particular from approximately March through June of 2012.

The government presented evidence in its detention motion, and at the detention hearing on March 17, 2015. In particular, the government noted the strength of its case, the defendant's exposure to lifetime imprisonment and a mandatory minimum of 15 years' incarceration, in light of the additional charges contained in the second superseding indictment that was returned on March 12, 2015. Also, the government noted the depravity, seriousness, and danger associated with the defendant's illegal actions with a 15 year old minor. The evidence included the following:

- (1) Hundreds of Facebook chats between the defendant and minor in which the defendant enticed and coerced the minor to take "pics", "not ones [you] can put on [Facebook]";
- (2) The fact that sexually explicit images that were sent to the defendant from the minor, at his insistence, on at least two occasions; images which constitute child pornography;
- (3) The fact that the victim will testify that she had sexual relations with the defendant, vaginal and anal intercourse and fellatio; and
- (4) Facebook chats between the minor and the defendant which document past

illegal sexual activity between them and discuss future “better” sexual activity.

At the detention hearing, Judge Perkin stated that (1) ROBERT WENDELL LANDIS could be released on \$100,000 O/R bail without posting the bail secured by a piece of property, placed on electronic monitoring and other usual conditions of pre-trial release. These conditions of release are wholly insufficient to address the risk of flight posed by the defendant, and provide no security to the community, to whom the defendant is a danger. Defendant has failed to rebut the presumption of detention applicable to him under Title 18, United States Code, Section 3142(e).

This Court should reverse Judge Perkin's Order releasing defendant LANDIS and detain him pending trial because there is no condition or combination of conditions which will reasonably assure his appearance as required or assure the safety of the community. *See* 18 U.S.C. § 3142(e). LANDIS is both a danger to the community and a serious risk of flight.

II. STATEMENT OF FACTS

A. The Offense Conduct

In October of 2012, Facebook notified the FBI that they had information that a 27 year old man was involved in communicating with a minor and in receiving child pornography. Facebook had discovered suspected sexual conversations between an adult male and a minor female. Facebook notified the National Center for Missing and Exploited Children (NCMEC) who subsequently notified the FBI. The defendant, Robert Wendell Landis, was determined to be the user who was engaging in the sexual conversations with a minor in violation of Facebook's terms of service; they disabled his Facebook profile as a result of this.

Through further investigation, the minor was identified. She was interviewed by a

child victim specialist, while being observed by an FBI agent, when she was 16 years old. During the interview, the minor indicated that she knew the defendant and that she had engaged in sexual activity with him on multiple occasions. In particular she stated that she engaged in oral, anal and vaginal sex with the defendant. She further stated that she was still in telephonic and Facebook contact with the defendant. This interview was on December 5, 2012. The minor was able to retrieve the defendant's telephone number from her cell phone and provided it to the investigators.

A search warrant was executed on Facebook and hundreds of chats between the defendant and minor were recovered. The Facebook messages exchanged between the defendant and the minor (1) reveal that the defendant encouraged the minor to take images of child pornography (CP) of herself to send to him using their email accounts; (2) corroborate that the defendant and minor engaged in sexual activities; and (3) disclose that the defendant was aware that the minor was under 18 years of age and had suicidal tendencies, causing her mother to have a babysitter watch her at certain times. Email addresses of the defendant which are specifically identified in these Facebook chats are the locations in which the CP images of the minor were recovered. The dates of these chats correspond with the dates that the CP images were sent. They span the time period, 3/21/12 to 7/20/12.

A sampling of these chats provides insight into the depraved and disgusting nature of the defendant's criminal conduct. [See Exhibit A, attached.]¹

¹ Exhibit A consists of three separate entries of the Facebook chats, separated by a sheet of paper. The minor victim's name is redacted to reveal only the initials of her name, F.H.. There are hundreds of pages of Facebook chats with the minor containing similar disturbing conversations.

B. LANDIS's Character

The court should consider: "the person's character, physical and mental condition, family ties, employment, financial resources, length of residence in the community, community ties, past conduct, history relating to drug or alcohol abuse, criminal history, and record concerning appearance at court proceedings." Although the defendant does not have a lengthy criminal history-- he has two prior convictions, for harassment and possession of pills-- there is reason to hold him pretrial. Prior to the return of the second superseding indictment, the defendant was facing only a five year mandatory minimum term of imprisonment. Now, he is exposed to a mandatory-minimum sentence of 15 years' incarceration, with a maximum statutory exposure of life imprisonment. Although he has ties to this community, the government's case is very strong and presents the defendant with the possibility of a lengthy term of incarceration. This translates into making the defendant a significant risk of flight. As you are aware, Your Honor noted at the last hearing before you on this case, on February 23, 2015, that the defendant's bail would have to be revisited should the government supersede with the anticipated, and now actual charges.

Also, while on pretrial release on the original charges, and just after the last hearing before Your Honor, on February 23, 2015, the defendant was found to have accessed his Facebook account while at work. Not only was this a violation of the terms of his pretrial release, but also, this medium, that is, Facebook, is the very method by which the defendant committed the crimes alleged in the indictment. Clearly, this was not something that the defendant should have been doing. Furthermore, the fact that he did it at his place of employment, where Pretrial Services

(PTS) would not be able to monitor his computer, reveals the defendant's intention; to circumvent the restrictions that had been placed on him by PTS.

Based upon the serious charges in this case and the mandatory-minimum sentence of 15 years' incarceration that the defendant is facing, the Court should order the defendant to be detained. Insufficient facts have been presented that would outweigh the significant risk of flight and danger to the community posed by the defendant's release.

III. ARGUMENT

A. Standard of Review

In reviewing a magistrate judge's bail decision, the district court should make an independent, *de novo* determination of the defendant's request for bail. United States v. Delker, 757 F.2d 1390, 1394-95 (3d Cir. 1985); *accord*, United States v. Thibodeaux, 663 F.2d 520 (5th Cir. 1981) (district court's responsibility to reconsider conditions of release fixed by another judicial officer is unfettered as if it were considering whether to amend its own action, and district court need not look for abuse of discretion or defer to judgment of prior judicial officer); *see* United States v. Maull, 773 F.2d 1479, 1481 (8th Cir. 1985) (*en banc*) (same rule applies where the defendant challenges detention order). The statute permits the district court to hold a second evidentiary hearing. The Court may consider all the evidence adduced below as well as other evidence the parties may supply. Under this standard, the Release Order should be revoked, for the reasons stated in this Brief.

This Court should revoke the Magistrate Judge's order releasing LANDIS and detain him pending trial because he is both a danger to the community and a serious risk of flight.²

2 The government must prove by a preponderance of the evidence that no conditions of

Because he faces a mandatory minimum sentence of 15 years and a statutory maximum of life imprisonment, and is charged in this case with an offense involving a minor victim, under sections 2251, 2252(a)(2) and 2422, of Title 18, this Court must presume LANDIS is both a danger to the community and a risk of flight absent sufficient rebuttal by the defendant. *See* 18 U.S.C. § 3142(e). LANDIS failed to rebut that presumption and should be detained.

B. Only Detention Will Protect The Community From The Danger Presented By ROBERT WENDELL LANDIS

Congress has concluded that, for purposes of bail, an offense involving a minor victim, under sections 2251, 2252(b)(2) and 2422, of Title 18, creates a rebuttable presumption that the defendant is a grave danger to the community. *See* 18 U.S.C. § 3142(e)(3)(E); *see also* United States v. Schenberger, Jr., 498 F.Supp.2d 738 (Dist. N.J. 2007); and United States v. MacEwan, 445 F.3d 237, 250 (3d Cir. 2006). LANDIS faces a mandatory minimum of 15 years imprisonment if convicted. Accordingly, there is a rebuttable presumption that LANDIS must be detained pending trial. *See* 18 U.S.C. § 3142(e)(3)(E). LANDIS failed to rebut the presumption at the detention hearing on March 17, 2015. LANDIS stated only that he lived in this district, was employed here and had not previously failed to appear. He suggested that his unauthorized use of Facebook at work was for employment reasons and that he did not understand that he was not to use the very method by which he enticed a minor girl illegally under the facts of this case, while on

release reasonably will assure the defendant's appearance or prove by clear and convincing evidence that no conditions of release will assure the safety of the community. *See* United States v. Himmler, 797 F.2d 156, 161 (3d Cir. 1986).

pretrial release.³ Such presentation utterly fails to rebut this presumption and, therefore, LANDIS should be detained pending trial.

In the Bail Reform Act, Congress explicitly determined that offenses involving a minor victim, presented a grave danger to the community. *See* 18 U.S.C. § 3142(e)(3)(E); MacEwan, 445 F.3d at 250. In such cases, there is a rebuttable presumption that the defendant should be detained pending trial. LANDIS presents the precise danger that Congress intended to protect the community from when it enacted the Bail Reform Act. In short, the seriousness of the crimes charged and LANDIS' conduct demonstrate that he will remain a grave danger to the community unless this Court orders 24-hour confinement pending trial as he could easily continue to arrange encounters with minors, no matter what restrictions the Court places on him short of detention. *See* 18 U.S.C. § 3142(e)(3)(E) (person accused of an offense involving a minor victim under section...2422); 18 U.S.C. § 3142(f)(1)(E) (any felony that is not otherwise a crime of violence that involves a minor victim); and/or 18 U.S.C. § 3142(g) (court must consider the severity of the crime in making detention decision where it involves a crime of violence).

The Magistrate Judge directed that LANDIS be released on \$100,000 bail without having the bail secured by a piece of property, that he submit to electronic monitoring and other usual conditions of pre-trial release. Given the ease with which the defendant could continue engaging in illegal activities involving minor victims – release to the immediate area where he

³ It appears that the defendant has difficulty following orders of this Court as well. When told by Your Honor to notify the Court of his new counsel should he retain someone, by February 27, 2015, the defendant, through prior counsel, indicated that he was going to retain an attorney from Miami, Florida. In fact, this attorney was never retained, but instead, current counsel was finally retained and entered his appearance March 10, 2015. This finally was accomplished, in large part, because prior counsel continued to contact the defendant and remind him of the date of the potential superseding indictment, the seriousness of the charges and his obligation already to have retained new counsel (having fired prior counsel).

originally engaged in such activity is woefully inadequate to ensure the community's safety. Accordingly, this Court should detain him pending trial.

C. LANDIS Presents A Serious Risk Of Flight

LANDIS also presents a serious risk of flight. Pursuant to 18 U.S.C. § 3142(e), this Court must presume he presents a serious risk of flight absent sufficient rebuttal. As detailed above, the weight of the evidence against LANDIS is substantial and presents a strong likelihood of conviction. He faces severe penalties if convicted. Conviction on the superseding charges, carries a mandatory minimum penalty of a combined 15 years imprisonment without the possibility of parole up to lifetime imprisonment. *See* 18 U.S.C. § 2422(b), 2251(a). The weight of the evidence against him combined with the severe penalties he faces on conviction creates a serious risk that LANDIS will flee to avoid these penalties.

The combination of factors present in this case clearly establishes that defendant is a risk of flight, and that bond and electronic monitoring are not enough to hold him to his obligation to appear before the court.

IV. CONCLUSION

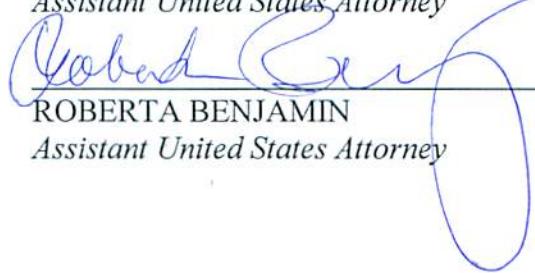
Because LANDIS presents a danger to the community and a serious risk of flight, and because LANDIS has failed to rebut the presumption of the Bail Reform Act, this Court should detain him pending trial. Only detention will adequately protect the community and assure his appearance at trial.

WHEREFORE, the United States of America respectfully requests that this Court enter the attached order staying Judge Perkin's release order pending a determination on the government's appeal of this order.

Respectfully submitted,

ZANE DAVID MEMEGER
United States Attorney
Eastern District of Pennsylvania

MICHAEL L. LEVY
Section Chief
Assistant United States Attorney


ROBERTA BENJAMIN
Assistant United States Attorney

Dated: March 18, 2015

Attachments

Recipients Wendell Landis (1641165072)
Ronnie Finley (621925701)
Author Ronnie Finley (621925701)
Sent 2012-08-05 01:32:19 UTC
Deleted false
Body let's go !!!

Attachments

Recipients Ronnie Finley (621925701)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-08-05 01:39:04 UTC
Deleted false
Body My lease is up in November

Attachments

Recipients Wendell Landis (1641165072)
Ronnie Finley (621925701)
Author Ronnie Finley (621925701)
Sent 2012-08-05 01:43:21 UTC
Deleted false
Body I'm down let me know

Attachments

(id.288254141260035)

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 17:38:06 UTC
Deleted false
Body U need more pics on here....

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 17:38:43 UTC
Deleted false
Body Haha I have an insane amount of pics on here

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 17:41:12 UTC
Deleted false
Body I have alotta cold ones but I dio have alotta neww oness

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 17:47:10 UTC
Deleted false
Body Lol...I wanna take pics of u....

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 17:47:41 UTC
Deleted false

Body Mmmm what kindd :)
Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 17:48:33 UTC
Deleted false
Body Not ones u can put on fb....

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 17:53:21 UTC
Deleted false
Body Maybe start out with underwear pics...

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 17:57:53 UTC
Deleted false
Body Mmm u can take any type u want :)

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 17:58:35 UTC
Deleted false
Body Maybe end up taking pics of u sucking my dick

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 17:59:02 UTC
Deleted false
Body I wouldnt mind that ;)

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:00:46 UTC
Deleted false
Body Or maybe a pic of my dick in ur ass....

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:01:37 UTC
Deleted false
Body Anything u want hun ;)

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:02:10 UTC
Deleted false
Body Ever take any pics like that before?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:02:28 UTC
Deleted false
Body Nopee
Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:03:09 UTC
Deleted false
Body Do u want to?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:03:39 UTC
Deleted false
Body I dont mind if u wanna

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:04:18 UTC
Deleted false
Body Does the idea turn u on?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:04:39 UTC
Deleted false
Body Mmm a bit ;)

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:05:02 UTC
Deleted false
Body We need a day where ur home alone...

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:06:09 UTC
Deleted false
Body We doo uhmmm I can get outta school at 12,one day if I need too ;)

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:06:34 UTC
Deleted false
Body Thursday?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 18:07:53 UTC

Deleted false

Body I can tryy

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 18:08:09 UTC

Deleted false

Body Will ur mom be home?

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 18:08:25 UTC

Deleted false

Body Idts

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 18:09:15 UTC

Deleted false

Body Do u have any way of taking a pic today?

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 18:11:23 UTC

Deleted false

Body I can take it but I have no way of sendin it

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 18:11:42 UTC

Deleted false

Body Can't email off ur phone?

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 18:12:10 UTC

Deleted false

Body No I dnt have email, it sucks

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 18:12:32 UTC

Deleted false

Body But ur iPod could email?

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 18:13:51 UTC

in or sneak out to ur car or if u wanted we could go bak to ur house
Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:52:12 UTC
Deleted false
Body Would ur parents let u go back to my place?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:52:38 UTC
Deleted false
Body Lol noo they wouldnt noee

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:53:14 UTC
Deleted false
Body We can't do that....bc I'm 18 there's too many legal things there....

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:54:09 UTC
Deleted false
Body Ughh im like tkin bout sneak out at late at night or I say imma go to the park then go to ur house

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:55:22 UTC
Deleted false
Body I know what ur saying but no

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 18:56:25 UTC
Deleted false
Body Lol ok then id have to iher jus meet u up at the park or sneak out to ur car or sneak u in

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 18:58:46 UTC
Deleted false
Body We'll figure it out

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 19:01:56 UTC
Deleted false

Body U need to figure out how to send me a few pics
Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 19:03:14 UTC

Deleted false

Body lk how but I cnt get on a computer at home to do it,,, I have an email I made juus
tohave pics in but I can only get to it at school

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 19:03:38 UTC

Deleted false

Body Do u have pics in it?

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 19:04:28 UTC

Deleted false

Body Yeah. But rite now there not organised, they have normal and sexy pics all mixed in

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 19:04:45 UTC

Deleted false

Body Send them to me tomorrow

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 19:05:09 UTC

Deleted false

Body Okay :) will doo!

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 19:06:02 UTC

Deleted false

Body Altho there like not neww cuz I dnt have a micro sd flash drivee to get pics off my
phone to the email

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)

Wendell Landis (1641165072)

Author Wendell Landis (1641165072)

Sent 2012-04-29 19:07:26 UTC

Deleted false

Body How old r they?

Attachments

Recipients Wendell Landis (1641165072)

F [REDACTED] H [REDACTED] (1334013414)

Author F [REDACTED] H [REDACTED] (1334013414)

Sent 2012-04-29 19:08:06 UTC

Deleted false

Body Idkk from like when I first started sending this year to like t weeks ago
Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 19:08:42 UTC
Deleted false
Body Have I seen them?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 19:08:57 UTC
Deleted false
Body Some

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 19:09:11 UTC
Deleted false
Body Y not all?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 19:09:38 UTC
Deleted false
Body Lol cuz I havent known u sence jan

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 19:09:55 UTC
Deleted false
Body Still coulda shown e

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 19:10:38 UTC
Deleted false
Body Haha uve seen most haha im not sure if uve seen all of them tho

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-04-29 19:11:04 UTC
Deleted false
Body I doubt that

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-04-29 19:11:34 UTC
Deleted false
Body Lol doubt wht

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-05-03 13:30:33 UTC
Deleted false
Body Like 330~4

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-05-03 13:31:40 UTC
Deleted false
Body K

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-05-03 13:32:12 UTC
Deleted false
Body Do u think ull last longer? Cuz of how tight I am? ;)

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-05-03 13:33:06 UTC
Deleted false
Body Well see

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-05-03 13:34:33 UTC
Deleted false
Body Haha I wasnt even goinn fast when u visited :P im kindaa jus sat on ya :P haha

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-05-03 13:34:56 UTC
Deleted false
Body U had me worked up...

Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)
Author Wendell Landis (1641165072)
Sent 2012-05-03 13:40:32 UTC
Deleted false
Body R u shaved?

Attachments

Recipients Wendell Landis (1641165072)
F [REDACTED] H [REDACTED] (1334013414)
Author F [REDACTED] H [REDACTED] (1334013414)
Sent 2012-05-03 13:40:46 UTC
Deleted false
Body Yep

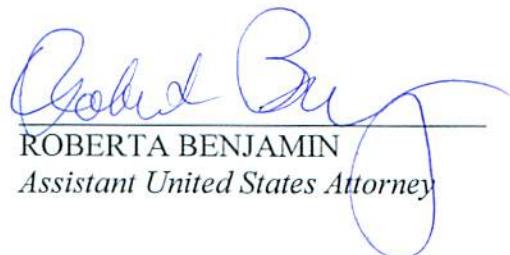
Attachments

Recipients F [REDACTED] H [REDACTED] (1334013414)
Wendell Landis (1641165072)

CERTIFICATE OF SERVICE

I certify that on this day I caused a copy of the United States' Brief in Support of its Motion to Detain Defendant to be served by electronic monitoring and email:

Evan T.L. Hughes, Esq.
The Hughes Firm, LLC
1845 Walnut Street, Suite 932
Philadelphia, PA 19103
evan.hughes@hughesfirm.pro


ROBERTA BENJAMIN
Assistant United States Attorney

Date:

3/18/15